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2	Reno City Attorney WILLIAM E. COOPER		
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8	cooperw@reno.gov		
9	parkerh@reno.gov Attorneys for City of Reno		
10	and Jason Soto		
11	UNITED STAT	ES DISTRICT COURT	
12	DISTRICT OF NEVADA		
13			
		* * \Diamond * *	
14	REBECCA GASCA, an individual,	CASE NO.: 3:22-cv-00238-MMD-CSD	
15	Plaintiffs,		
16	VS.	STIPULATION FOR ORDER TO EXTEND STAY	
17	CITY OF RENO, Nevada, a Municipal		
18	Corporation; et al.	(SECOND REQUEST)	
19	Defendants.		
20		_ /	
21			
22	Plaintiff, Rebecca Gasca and Defendants City of Reno ("City") and Jason Soto		
23	(collectively "the Parties"), by and through their undersigned counsel of record, hereby stipulate		
24	as follows:		
25	<u>w</u>	<u>HEREAS</u>	
26	1. On October 12, 2022, the Court entered the Order to Withdraw Motions to		
27	Dismiss and Amend Complaint and Stay Case Deadlines Pending Settlement and Mediation		
28	("the Stay Order") (ECF No. 35).		
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- 2. Pursuant to the Stay Order (ECF No. 35), the Parties filed a Joint Status Report on December 28, 2022 advising they have reached general terms of a recommended settlement that, if approved by City Council, will resolve the remaining claims in the case (ECF No. 40).
- 3. On December 28, 2022, the Court entered a Minute Order ordering that settlement documents or a joint status report are due February 28, 2023 (ECF No. 41).
 - 4. This matter has been effectively stayed since entry of the Stay Order.
- 5. The Parties agree that the case deadlines in this matter should continue to be stayed pending their efforts to obtain approval for the settlement from City Council and memorialize the proposed terms in a written settlement document.

STIPULATION

- 6. Accordingly, based on the Parties' efforts to resolve the case, the parties hereby stipulate and request that the Court extend the stay of the case deadlines.
- 7. The Parties further agree that, in the event settlement is not approved, an additional stipulation and order to extend deadlines will be necessary (extending the current deadlines by the time the stay has been in effect). The Parties further stipulate that Plaintiff's deadline to amend the Complaint has been stayed, and a new deadline to file a motion to amend the pleadings or add parties will be set forth in the new stipulation and order setting deadlines if the settlement is not completed.
- 8. If the settlement is not approved, the Parties agree they will meet and confer by March 21, 2023, regarding lifting the stay of current deadlines and an additional stipulation and ///

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1	order to extend deadlines. This is 21 days after the joint status report regarding the status of	
2	settlement is due.	
3	Dated this 26 th day of January, 2022.	Dated this 26 th day of January, 2023.
5	RENO CITY ATTORNEY	McLETCHIE LAW
6	/s/ Holly S. Parker	/s/ Margaret A. McLetchie
7	KARL S. HALL Reno City Attorney	MARGARET A. McLETCHIE Nevada Bar No. 10931
8	HOLLY S. PARKER Deputy City Attorney	PIETER M. O'LEARY Nevada Bar No. 15297
9	Nevada State Bar No. 10181	LEO S. WOLPERT
10	Post Office Box 1900 Reno, Nevada 89505	Nevada Bar No. 12658 602 South Tenth Street
11	Attorneys for Defendants City of Reno and	Las Vegas, Nevada 89101
12	Jason Soto	Attorneys for Plaintiff
13	0	RDER
14		
15	IT IS SO ORDERED.	
16	Dated this 27th day of January	, 2023.
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19	UNITED	STATES DISTRICT COURT JUDGE
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N.7		

Reno City Attorney P.O. Box 1900 Reno, NV 89505

1	<u>CERTIFICATE OF SERVICE</u>	
2	Pursuant to FRCP 5(b), I certify that I am an employee of the RENO CITY ATTORNEY'S	
3	OFFICE, and that on this date, I am serving the foregoing Stipulation for Order to Extend Stay	
4	(Second Request) on the party(s) set forth below by:	
5 6 7	Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage prepaid, following ordinary business practices or;	
8	Personal delivery.	
9	X CMECF electronic service.	
10	Facsimile (FAX).	
11 12	Federal Express or other overnight delivery.	
13	Reno/Carson Messenger Service.	
14		
15	addressed as follows:	
16	Margaret A. McLetchie, Esq.	
17	Pieter M. O'Leary, Esq. Leo S. Wolpert, Esq.	
18	McLETCHIE LAW	
19	602 South Tenth Street Las Vegas, NV 89101	
20	Attorneys for Plaintiff	
21	DATED this 26th day of January, 2023.	
22	DiffED this 20th day of sundary, 2023.	
23	/s/ Jeanette Sparks	
24	Jeanette Sparks	
25	Legal Assistant	
26		
27		
28		
Reno City Attorney P.O. Box 1900 Reno, NV 89505		